1 MICHAEL T. LUCEY (SBN: 99927) MICHAEL A. LAURENSON (SBN: 190023) 2 GORDON & REES LLP Embarcadero Center West 3 275 Battery Street, Suite 2000 San Francisco, CA 94111 4 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 5 Attorneys for Defendant THE REGENTS OF THE UNIVERSITY OF CALIFORNIA 7 UNITED STATES DISTRICT COURT 8 9 NORTHERN DISTRICT OF CALIFORNIA 10 ANDREA NAKAGAWA. CASE NO. C06-02066 SI 11 Plaintiff, STIPULATION & PROPOSED ORDER 275 Battery Street, Suite 2000 **RE: STAY Embarcadero Center West** San Francisco, CA 94111 12 Gordon & Rees LLP VS. 13 THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, et al., 14 Defendants. 15 16 WHEREAS Plaintiff filed the instant action when she did in order to avoid the running of 17 her federal right-to-sue letter; and, 18 WHEREAS Plaintiff's University grievance based on some of the same facts as alleged 19 herein is presently ongoing, with hearing dates presently scheduled through May 2006; and, 20 WHEREAS the outcome of Plaintiff's University grievance may give rise to legal issues 21 of administrative exhaustion, judicial exhaustion, res judicata and collateral estoppel, or may 22 remedy some or all of the harm claimed herein; 23 THEREFORE, the parties, by and through their attorneys, hereby stipulate and agree that 24 the instant action should be stayed until Plaintiff's University grievance is completed, and at 25 least until the date set for the Initial Case Management Conference, July 21, 2006, absent 26 completion of the grievance or until either side provides the other 30 days notice that it wishes to 27 withdraw from this stipulation and return the cause to the active calendar. 28 STIP & ORDER RE: STAY – CASE NO. C06-02066 SI

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Gordon & Rees LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111	1	Dated: March <u>23</u> , 2006	LAW OFFICES OF NEVIN & ABSALOM
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	3		By: <u>/s/ Kenneth C. Absalom</u> Kenneth C. Absalom
	4		Attorneys for Plaintiff ANDREA NAKAGAWA
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	6	Dated: March <u>23</u> , 2006	GORDON & REES, LLP
	7		
	8		By: /s/ Michael A. Laurenson Michael A. Laurenson Attorneys for Defendants
	10		THE REGENTS OF THE UNIVERSITY OF CALIFORNIA
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	12	Based on the foregoing stipulation of the parties and good cause appearing therefore, IT	
	13	IS HEREBY ORDERED that the instant case is STAYED until the Initial Case Management	
	14	Conference, July 21, 2006, or until further order of this court.	
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	16		Juan Delaton
	17	Dated	United States District Court Judge
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